

**FILED**

Jan 11 2021

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

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10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
12 SAN JOSE DIVISION

13  
14 UNITED STATES OF AMERICA,  
15 Plaintiff,  
16 v.  
17 GABRIEL SANCHEZ,  
18 Defendant.

No. CR 20-00282 BLF (NC)

**REQUEST FOR ORDER SHORTENING  
TIME FOR HEARING MOTION FOR  
RECONSIDERATION OF DETENTION  
ORDER; ORDER SHORTENING TIME**

**Court:** Courtroom 5, 4th Floor  
**Hearing Date:** January 14, 2021  
**Hearing Time:** 1:00 P.M.

22 Gabriel Sanchez, by and through counsel, respectfully requests that the Court issue an  
23 order shortening time, so that his separately-filed motion for reconsideration of the order of  
24 detention may be heard on January 14, 2021. A proposed order shortening time is submitted  
25 herewith.

26 ///

28 NO. CR 20-00282 BLF (NC)  
REQ. FOR ORDER SHORTENING TIME;  
ORDER

## **ARGUMENT**

Gabriel Sanchez has filed a motion to reconsider the Court's order detaining him during the pendency of his case. The motion is based on changed circumstances, such as engagement in educational programming and additional surety information, as well as the circumstance of the COVID-19 pandemic and other factors warranting his immediate release. In the instant motion, the defense respectfully requests that the Court hear this motion on shortened time, specifically on January 14, 2021. Undersigned counsel has conferred with the government and counsel for both parties are available on this date.

Criminal Local Rule 47-2(a) states that “except as the assigned judge directs or these criminal local rules require,” all criminal motions shall be noticed not less than 14 days after service of the motion. Crim. L. Rule 47-2(a). The defense respectfully requests that the Court direct that the motion may be heard on shortened time because of the urgency of the situation caused by the current public health crisis.

Undersigned counsel has conferred with government counsel and requests the following schedule: Government's opposition brief due on January 13, 2021, and motion hearing on January 14, 2021. The defense waives reply briefing and will reserve such argument for the hearing on this matter.

## CONCLUSION

For the foregoing reasons, the Court should issue an order shortening time to allow the motion to be heard on January 14, 2021, at 1:00 p.m.

Date: January 11, 2021

Respectfully submitted,

STEVEN G. KALAR  
Federal Public Defender

/S/ Severa Keith  
SEVERA KEITH  
Assistant Federal Public Defender

NO. CR 20-00282 BLF (NC)  
REQ. FOR ORDER SHORTENING TIME;  
ORDER

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

No. CR 20-0282 BLF (NC)

**Plaintiff,**

## **ORDER SHORTENING TIME**

V.

GABRIEL SANCHEZ,

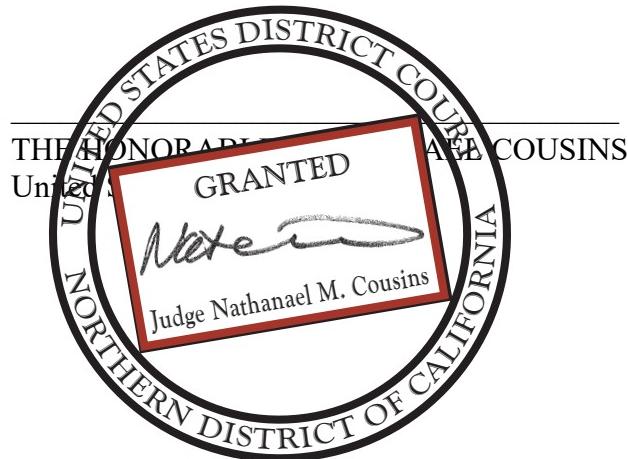
**Defendant.**

GOOD CAUSE APPEARING, the Court hereby GRANTS the request of Gabriel Sanchez to hear his motion for reconsideration of the order of detention on shortened time, and HEREBY ORDERS that the motion shall be heard on January 14, 2021, at 1:00 p.m.

The government's opposition brief is due on January 13, 2021.

IT IS SO ORDERED.

Dated: January 11, 2021



NO. CR 20-00282 BLF (NC)  
REQ. FOR ORDER SHORTENING TIME;  
ORDER